

Dear Judge Kiel:

I represent the plaintiffs in the above-entitled litigation. Paul Batista, a member of the New York Bar and also a member of the United States Court of Appeals for the Third Circuit, has on my motion been admitted on a pro hac vice basis to assist in the representation of plaintiffs.

With the consent of counsel to defendants, I am writing for the purpose of respectfully requesting that Your Honor extend, for a one-week period, from January 20, 2022 to January 27, 2022, the date for the filing of the Joint Final Pre-Trial Order.

I know that Mr. Batista and counsel to the defendants have been working together and cooperatively on the preparation of drafts of the Joint Final Pre-Trial Order. There have been exchanges of drafts, which will continue from today through January 27, 2022, in the event Your Honor grants this application. I understand that Mr. Batista, who unfortunately had to take a ten day break from work in late December and early January to recover from Covid-19, has developed a very professional rapport with counsel to defendants.

For the foregoing reasons, I respectfully request that the Court grant a one week extension, from January 20, 2022, to January 27, 2022, of the date for filing the Joint Final Pre-Trial Order.

Respectfully submitted,

s/ Dominick Minervini

Dominick Minervini

Cc: All Counsel of Record